

GIBSON DUNN

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June 30, 2022

VIA ECF

The Honorable Lorna G. Schofield, U.S.D.J.  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Securities and Exchange Commission v. Abraham Mirman*, 17 Civ. 5821 (LGS)

Dear Judge Schofield:

I write as counsel to Defendant Avi Mirman to request a 30-day extension of the deadline for the parties to submit their Joint Pretrial Order, which is currently due on July 15, 2022. *See* ECF No. 214.

The reason for the request is that today marks undersigned counsel's last day at Gibson Dunn, and I will be transferring my practice to another law firm in New York in short order. Mr. Mirman has indicated an intention to transfer the defense of this matter to my new law firm, as well. However, it will take some time for Mr. Mirman and my law firm to agree on the terms of the engagement and for the litigation files to be transferred from Gibson Dunn. As a result, it will be exceedingly challenging, if not impossible, for defense counsel to be in a position to finalize the Joint Pretrial Order in the next two weeks.

While the defense is requesting a one-month extension of that deadline, we do not anticipate seeking—nor do we desire—any adjournment of the remaining deadlines in the case, including the September 15 final pretrial conference or the anticipated October 11 trial commencement date. Indeed, as Your Honor is aware, on June 24, 2022, the parties filed their Joint Requests to Charge, Voir Dire, and Verdict Form. Despite undersigned counsel's change in law firm, Mr. Mirman wishes to proceed to trial in this matter on October 11, 2022, as scheduled, and undersigned counsel has every intention to proceed to trial on that date as well.

On June 27, 2022, the parties met and conferred regarding this extension request, and the SEC consents to this request, provided that I keep the SEC apprised of any issues arising with Mr. Mirman's engagement of my new firm. I have told the SEC that I expect that the engagement issue will be resolved within the next two weeks, and that I see no issues in completing our work on the Joint Pretrial Order in accordance with the adjournment I am proposing. I expect that, once a new law firm is engaged, Gibson Dunn & Crutcher will seek to withdraw as counsel of record in this matter.

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For the foregoing reasons, I respectfully request that the deadline for the parties to submit their Joint Pretrial Order be adjourned from July 15, 2022 to August 15, 2022.

We thank the Court for its consideration.

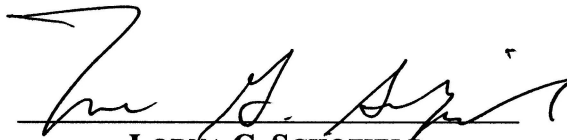
Respectfully submitted,

/s/ Avi Weitzman  
Avi Weitzman

cc. All Counsel of Record (via ECF)

Application GRANTED. The deadline to file the joint pretrial order is extended to **August 15, 2022**.

Dated: June 30, 2022  
New York, New York

  
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**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**